

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

L3HARRIS TECHNOLOGIES, INC.,	)	
	)	
Plaintiff / Counterclaim Defendant	)	No. 2:18-cv-00439-JRG (Lead Case)
	)	
v.	)	
	)	
HUAWEI DEVICE USA, INC.	)	
HUAWEI DEVICE CO., LTD.,	)	Jury Trial Demanded
HUAWEI TECHNOLOGIES USA INC.,	)	
HUAWEI TECHNOLOGIES CO. LTD., AND	)	
HUAWEI DEVICE (SHENZHEN) CO., LTD.,	)	
	)	
Defendants / Counterclaimants.	)	
	)	

---

HUAWEI DEVICE USA, INC.	)	
HUAWEI DEVICE CO., LTD.,	)	
HUAWEI TECHNOLOGIES USA INC.,	)	No. 2:19-cv-00222-JRG (Member Case)
HUAWEI TECHNOLOGIES CO. LTD., AND	)	
HUAWEI DEVICE (SHENZHEN) CO., LTD.,	)	
	)	
Plaintiffs / Counterclaim Defendants,	)	
	)	Jury Trial Demanded
v.	)	
	)	
HARRIS CORPORATION and L3	)	
TECHNOLOGIES, INC.,	)	
	)	
Defendant / Counterclaimant.	)	
	)	

---

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

WHEREAS, the parties have reached an agreement that resolves the disputes between them that are currently pending in this Court and desire a brief stay period in order to finalize and file a formal dismissal. The parties have further agreed that 45 days is an appropriate time period in which to accomplish this in the circumstances—including coordination with respect to

dismissal in other proceedings in the District of Delaware (where the parties have also agreed on and requested 45 days) and before the PTAB.

Plaintiffs, Counterclaimants, and Counterclaim Defendants L3Harris Technologies, Inc. (formerly Harris Corporation) and L3 Technologies, Inc., and Defendants, Counterclaimants, and Counterclaim Defendants Huawei Device USA Inc., Huawei Device Co., Ltd., Huawei Technologies USA Inc., Huawei Technologies Co., Ltd., and Huawei Device (Shenzhen) Co., Ltd. hereby jointly and respectfully move the Court to stay all deadlines in the Lead and Member cases (Case Nos. 2:18-cv-00439-JRG and 2:19-cv-00222-JRG) pending dismissals that the parties will file within 45 days.

The above constitutes good cause for the Court to grant the Motion.

WHEREFORE, the parties jointly and respectfully request that the Court grant their Joint Motion to stay all deadlines in the cases.

Dated: October 3, 2019

Respectfully Submitted,

By: /s/ Denise De Mory

Henry C. Bunsow  
Denise De Mory  
Christina Finn  
Robin Curtis  
Corey Johanningmeier  
Nicholas Mancuso  
**BUNSOW DE MORY LLP**  
701 El Camino Real  
Redwood City, CA 94063  
Telephone: (650) 351-7248  
Facsimile: (415) 426-4744  
hbunsow@bdiplaw.com  
ddemory@bdiplaw.com  
cfinn@bdiplaw.com  
rcurtis@bdiplaw.com  
cjohanningmeier@bdiplaw.com  
nmancuso@bdiplaw.com

S. Calvin Capshaw  
State Bar No. 03783900  
Elizabeth L. DeRieux  
State Bar No. 05770585  
**CAPSHAW DERIEUX, LLP**  
114 E. Commerce Ave.  
Gladewater, TX 75467  
Telephone: 903-845-5770  
Email: [ccapshaw@capshawlaw.com](mailto:ccapshaw@capshawlaw.com)  
Email: [ederieux@capshawlaw.com](mailto:ederieux@capshawlaw.com)

Attorneys for  
**HARRIS CORPORATION**

Dated: October 3, 2019

Respectfully Submitted,

/s/ James R. Batchelder  
Melissa R. Smith  
**GILLAM & SMITH, LLP**  
TX State Bar No. 24001351  
303 S. Washington Ave.  
Marshall, Texas 75670  
Telephone: (903) 934-8450  
Facsimile: (903) 934-9257  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)

James R. Batchelder  
(CA Bar No. 136347)  
(Eastern District of Texas Member)  
James L. Davis, Jr.  
(CA Bar No. 304830)  
(Eastern District of Texas Member)  
Andrew T. Radsch  
(CA Bar No. 303665)  
(Eastern District of Texas Member)  
Christopher M. Bonny  
(CA Bar No. 280554)  
(Eastern District of Texas Member)  
**ROPES & GRAY LLP**  
1900 University Avenue, 6th Floor  
East Palo Alto, CA 94303-2284  
Telephone: (650) 617-4000

Facsimile: (650) 617-4090  
james.batchelder@ropesgray.com  
james.l.davis@ropesgray.com  
andrew.radsch@ropesgray.com  
christopher.bonny@ropesgray.com

Kevin J. Post  
(NY Bar. No. 4382214)  
(Eastern District of Texas Member)  
Alexander E. Middleton  
(NY Bar. No. 4797114)  
(Eastern District of Texas Member)  
Jolene L. Wang  
(NY Bar No. 5462619)  
(Eastern District of Texas Member)  
**ROPES & GRAY LLP**  
1211 Avenue of the Americas  
New York, NY 10036  
(212) 596-9000  
(212) 596-9090  
kevin.post@ropesgray.com  
alexander.middleton@ropesgray.com  
jolene.wang@ropesgray.com

Attorneys for  
**HUAWEI DEVICE USA, INC.,**  
**HUAWEI DEVICE CO., LTD.,**  
**HUAWEI TECHNOLOGIES USA INC.,**  
**HUAWEI TECHNOLOGIES CO. LTD., and**  
**HUAWEI DEVICE (SHENZHEN) CO., LTD**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) with a copy of this document via the Court's CM/ECF system.

Dated: October 3, 2019

By: /s/ *Denise M. De Mory*  
Denise De Mory